

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

MOBILITY WORKX LLC,

Plaintiff,

v.

AMAZON.COM SERVICES LLC and
AMAZON WEB SERVICES, INC.,

Defendants.

Civil Action No. 4:24-cv-01060-ALM

JURY TRIAL DEMANDED

JOINT MOTION FOR ENTRY OF AGREED VENUE DISCOVERY ORDER

Plaintiff Mobility Workx LLC (“Mobility Workx” or “Plaintiff”) and Defendants Amazon.com Services LLC and Amazon Web Services, Inc.’s (collectively “Amazon”) jointly move for entry of an agreed venue discovery order. Mobility Workx filed its Complaint in this matter on November 29, 2024. Dkt. 1. Amazon filed a Motion to Dismiss for Improper Venue and Failure to State a Claim on February 13, 2025 (“MTD”). Dkt. 18. Mobility Workx’s current deadline to respond to Amazon’s MTD is March 20, 2025.

The parties have agreed to jointly move the Court to enter an order extending the schedule for briefing regarding Amazon’s MTD and providing for discovery relating thereto as follows:

1. Mobility Workx may serve the following written discovery relating to Amazon’s MTD: (a) up to 7 requests for production; (b) up to 6 interrogatories; and (c) up to 3 requests for admission. Amazon reserves all rights to object to such requests.
2. Amazon may serve up to 5 requests for production relating to its MTD. Mobility Workx reserves all rights to object to such requests.
3. Mobility Workx may conduct the following depositions, each totaling no more than 3

hours of examination and limited to issues relating to Amazon's MTD: (a) 30(b)(1) depositions of all non-attorney declarants upon which Amazon has relied for its MTD; and (b) up to 2 30(b)(1) depositions of additional individuals identified during discovery. All depositions shall be conducted remotely.

4. The parties shall serve written discovery within 7 days of the Court entering an Order to this effect. The parties shall serve responses within 28 days of service of the written discovery. Depositions shall be conducted within 28 days of completion of all written discovery.

5. A party receiving discovery responses shall have 7 days from receipt to make a request to meet and confer and identify all disputes. Disputes over venue discovery shall be governed by the Court's standard order regarding the resolution of discovery disputes:

DISCOVERY DISPUTES

In the event the parties encounter a discovery dispute, no motions to compel may be filed until after the parties fulfill the "meet and confer" requirement imposed by this Court's Local Rule CV-7(h). If the parties are unable to resolve the dispute without court intervention, the parties must then call the Court's chambers to schedule a telephone conference regarding the subject matter of the dispute prior to filing any motion to compel. After reviewing the dispute, the Court will resolve the dispute, order the parties to file an appropriate motion, or direct the parties to call the discovery hotline.

A magistrate judge is available during business hours to immediately hear discovery disputes and to enforce provisions of these rules. The hotline number is (903) 590-1198. *See* Local Rule CV-26(e).

6. Within fourteen days of the completion of the foregoing venue discovery, Mobility Workx shall file its opposition, if any, to Amazon's motion to dismiss. Amazon shall then have 14 days to file its reply. Mobility Workx may file a sur-reply within 14 days thereafter.

Therefore, the parties move the Court to grant this joint motion and enter the proposed venue discovery order.

Dated: March 20, 2025

Respectfully submitted,

/s/ Daniel B. Ravicher

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Attorneys for Defendants
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CERTIFICATE OF SERVICE

I hereby certify that on the 20th day of March 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

/s/ Daniel B. Ravicher
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